

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In Re:)	
JULIE A. FISH,)	Case No. 14-41200-705
Debtor,)	Chapter 7
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MS. E. REBECCA CASE,)	Debtor's Response to Shorten Notice on Notice
Chapter 7 Trustee/Movant,)	for Motion to Compel Turnover of Property
vs.)	
JULIE A. FISH,)	Hearing Date: February 25, 2015
Debtor/Respondent,)	Hearing time: 9:30 A.M.

**DEBTOR'S RESPONSE TO SHORTEN NOTICE ON MOTION TO
COMPEL TURNOVER OF PROPERTY**

Comes Now, Julie A. Fish, by and through her attorney, Steven C. Bublitz, and for the Debtor's Answer to the Chapter 7 Trustee's Motion to Shorten Notice on Notice for Motion to Compel and states as follows:

- 1.) Debtor admits the allegations contained in paragraphs 1, 2, 3, 4, 5, and 6 of the Movant's Motion to Shorten Notice on Notice to Compel Turnover of Property.
- 2.) Debtor denies the allegations contained in paragraph 7, 8, 9, 10, 11, and 12 of the Movant's Motion to Shorten Notice on Notice for Motion to Compel.
- 3.) That by way of further answer the Movant's Motion is moot in that Debtor's counsel will have the safety deposit box key by the close of business on Monday, February 23, 2015 and the Movant did not need to pursue a Motion in this matter in that Debtor has previously turnover any documents in her possession, Debtor permitted the Chapter 7 Trustee to inspect her home, and Debtor has provided the Chapter 7 Trustee with multiple opportunities at multiple 341 Meetings of Creditors for the Chapter 7 Trustee to inquire about any questions she may have about the assets and liabilities in this case.

WHEREFORE, the Debtor prays this honorable court enter an order **Denying** the

Movant's Motion to Shorten Notice for Motion to Compel Turnover of Property and for such other and further orders as this honorable court deems just and proper under the circumstances.

Respectfully Submitted,

/s/ Steven C. Bublitz

Mr. Steven C. Bublitz MBE 38247
Attorney for Debtor/Respondent, Julie A. Fish
1113 Howdershell Road, Florissant, MO 63031
(314) 831-2277 (314) 831-2344 FAX
E-mail: sbublitz@bublitzlawoffice.com

Certificate of Service

A copy of the above and foregoing pleading was sent to the Ms. E. Rebecca Case, Chapter 7 Trustee, 7733 Forsyth Blvd, Suite 500, Clayton, Missouri 63105 and Ms. Janice Valdez, Attorney for Chapter 7 Trustee, 7733 Forsyth Blvd, Suite 500, Clayton, Missouri 63105, Ms. Lauren Tow, Attorney for Southwest Bank, 900 Jackson Street, Suite 100, Dallas, Texas 75202 and Hope Redmond, Commerce Bank, 8000 Forsyth Blvd, St. Louis, Missouri 63105 by sending a copy electronically through US Bankruptcy Court ECF System and by depositing a copy in the U.S. Mail, First Class Postage Prepaid on this 20th day of February, 2015 so certifies the undersigned.

/s/ Steven C. Bublitz